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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

United States of America,  
  
Plaintiff,

Case: 2:23-cr-20436  
Assigned To : Lawson, David M.  
Referral Judge: Altman, Kimberly G.  
Assign. Date : 7/27/2023  
Description: INDI USA BROADNAX ET AL (NA)

v.

Violations: 18 U.S.C. § 922(k)

Larry Broadnax Jr.,  
  
Defendant.

\_\_\_\_\_ /

**INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT ONE**

18 U.S.C. § 922(k)

*Possession of a Firearm with an Obliterated Serial Number*

On or about July 27, 2022, in the Eastern District of Michigan, Southern Division, the defendant, LARRY BROADNAX JR., knowingly possessed a firearm, that is one Smith & Wesson 9mm caliber pistol, which had the manufacturer's serial number removed, obliterated, or altered, said firearm having been shipped or transported in interstate or foreign commerce, in violation of Title 18, United States Code, Section 922(k).

**FORFEITURE ALLEGATION**

18 U.S.C. § 924(d) and 28 U.S.C. § 2461

*Criminal Forfeiture*

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18 United States Code Section 924(d) and Title 28, United States Code, Section 2461.

Upon conviction of the offense charged in Count One of this Indictment, Defendant LARRY BROADNAX JR. shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and 28 United States Code, Section 2461(c), any firearm or ammunition involved in or used in any knowing violation of said offense, including but not limited to one Smith & Wesson 9mm caliber pistol and ammunition.

THIS IS A TRUE BILL  
s/Grandjury Foreperson

GRAND JURY FOREPERSON

DAWN N. ISON  
United States Attorney

  
CRAIG F. WININGER  
Chief, Violent & Organized Crime Unit

  
MARK BILKO  
BARBARA LANNING  
Assistant United States Attorneys

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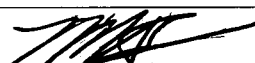
Assign. Date : 7/27/2023

Description: INDI USA BROADNAX ET AL (NA)

United States District Court  
Eastern District of Michigan

Criminal Case Cover Sheet

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete

<b>Companion Case Information</b>	<b>Companion Case Number:</b>
This may be a companion case based on LCrR 57.10(b)(4) <sup>1</sup> :	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: 

Case Title: USA v. Larry Broadnax Jr.

County where offense occurred: Wayne

Offense Type: Felony

Indictment -- based upon prior complaint [Case number: 2:22-mj-30324]

**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_


Reason: \_\_\_\_\_

Defendant NameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case

July 27, 2023

Date

  
 Mark Bilkovic  
 Assistant United States Attorney  
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 Detroit, MI 48226  
 mark.bilkovic@usdoj.gov  
 (313) 226-9623  
 Bar #: P48855

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.